

FILED BY 76 P.C.  
IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
05 SEP 16 PM 5:08 WESTERN DIVISION

FILED BY COB D.C.  
2005 SEP -6 PM 4:20

THOMAS M. GOULD  
CLERK, U.S. DISTRICT COURT  
WD OF TN, MEMPHIS  
UNITED STATES OF AMERICA,

Plaintiff,

v.

STACY LAYNE BEAVERS,

Defendant.

CRIM. NO. 2:05cr20248-01-D

**MOTION DENIED**

DATE: 9-16-2005

Bernice Bouie Donald  
**BERNICE BOUIE DONALD**  
**U.S. DISTRICT JUDGE**

**MOTION FOR MODIFICATION OF CONDITIONS OF PROBATION**

Comes the defendant, Stacy Layne Beavers, by and through counsel and respectfully moves the Court for an order modifying the conditions of her probation so as to permit some involvement with the family business, General Telemarketing International, Inc., and in support thereof, avers:

- (1) On the 4<sup>th</sup> day of August, 2005, the Court imposed judgment in the above-captioned matter.
- (2) As an additional condition of probation, the Court required that the defendant shall not participate in telemarketing businesses during the term of probation.
- (3) General Telemarketing International, Inc., was a business begun by the defendant's father and is largely owned by members of the Titterington family. The nature of the business is to service the telemarketing needs of a number of legitimate and well-recognized businesses.

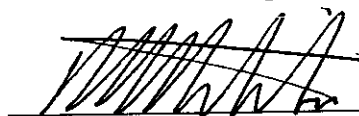
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This document entered on the docket sheet in compliance  
with Rule 55 and/or 32(b) FRCP on 9/19/05

(12)

- (4) The defendant's father, Richard Y. Titterington, passed away in December, 2004. Since his passing, the defendant has been called upon to act as a liaison between the outside certified public accountant and the in-house accounting department. It has been her responsibility to monitor the cash position of the company on a daily basis and to respond to questions regarding financial matters in discussions with management, outside CPA, and in-house accounting.
- (5) Although the defendant has completed the educational requirements to become a licensed practical nurse, and is now enrolled in further training to become a registered nurse, her family and the business are placed in a very difficult position if she is unable to provide the assistance which she was providing prior to the entry of the Judgment in this case.
- (6) Should the Court require any additional information in regard to this matter, counsel for the defendant will be glad to appear before the Court and respond to any concerns which the Court may have.

Respectfully submitted this \_\_\_\_ day of September, 2005.

**RITCHIE, FELS & DILLARD, P.C.**

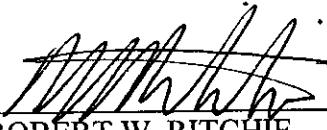


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**CERTIFICATE OF SERVICE**

I hereby certify that a true and exact copy of the foregoing motion was forwarded to the following this 2<sup>nd</sup> day of September, 2005:

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Assistant United States Attorney  
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\_\_\_\_\_  
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## Notice of Distribution

This notice confirms a copy of the document docketed as number 12 in case 2:05-CR-20248 was distributed by fax, mail, or direct printing on September 19, 2005 to the parties listed.

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Honorable Bernice Donald  
US DISTRICT COURT